

Building Blocks for Effective Housing Elements

Adequate Sites Inventory and Analysis

Inventory of Land Suitable for Residential Development

Government Code Section 65583(a)(3) requires local governments to prepare an inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites. The inventory of land suitable for residential development shall be used to identify sites that can be developed for housing within the planning period (Section 65583.2).

I. REQUISITE ANALYSIS

The purpose of the land inventory is to identify specific sites suitable for residential development in order to compare the local government's regional housing need allocation with its residential development capacity. The inventory will assist in determining whether there are sufficient sites to accommodate the regional housing need in total, and by income category. A thorough sites inventory and analysis will help the locality determine whether program actions must be adopted to "make sites available" with appropriate zoning, development standards, and infrastructure capacity to accommodate the new construction need. Preparing the inventory and accompanying site suitability analysis consists of a two step process. The site suitability and appropriate density statutory tests are addressed in Screens 14 through 17.

Site Inventory:

The housing element must identify specific sites or parcels that are available for residential development. Land suitable for residential development has characteristics that make the sites appropriate and available for residential use *in the planning period*. Sites identified that require rezoning may be included in the inventory provided the element includes a program to accomplish the rezoning early within the planning period. Other characteristics to consider when evaluating the appropriateness of sites include physical features (e.g. susceptibility to flooding, slope instability or erosion, or environmental considerations) and location (proximity to transit, job centers, and public or community services). Land suitable for residential development includes all of the following:

- vacant residentially zoned sites;
- vacant non-residentially zoned sites that allow residential development;

- underutilized residentially zoned sites capable of being developed at a higher density or with greater intensity; and
- non-residentially zoned sites that can be redeveloped for, and/or rezoned for, residential use (via program actions).

The inventory can also include sites that are in the process of being made available (i.e., planned) for residential uses via rezones or specific plans, provided the housing element includes a program that commits the local government to completing all necessary administrative and legislative actions early in the planning period.

The inventory must include all of the following:

1. A parcel-specific listing of sites, including the parcel number or other unique reference such as address. Sites identified in the inventory as available to accommodate the regional housing need for above moderate-income households, located in areas not served by public sewer systems, need not be listed on a parcel by parcel basis.
2. The general plan and zoning designations of sites.
3. A description of parcel size; this is important as parcel size can be a key factor in determining development viability, capacity and affordability.
4. A map showing the location of sites. In terms of scale, a jurisdiction's general plan land-use diagram or map is appropriate.
5. A description of existing uses of any non-vacant sites.
6. A general description of any known environmental constraints (see Screen 16).
7. A general description of existing or planned water, sewer, and other dry utilities supply, including the availability and access to distribution facilities (see Screen 16).

The following table is an example of a basic inventory of sites.

Available Land Inventory Summary

APN	Zone	Allowable Density	GP Designation	Acres	Realistic Unit Capacity	Existing Use	Infrastructure Capacity	On-site Constraints
041-0042-002	R-3	20-30 du/ac	Multifamily Residential	2.0	40	Vacant	Yes	None
037-0400-027	R-2	10-20 du/ac	Multifamily Residential	0.75	7	Duplex	Increases identified in the CIP	None
038-0100-040	R-1	5-10 du/ac	Single Family Residential	4.5	22	Vacant	Max Capacity	Wetlands can be mitigated
039-1100-039	CMU	20 du/ac	Mixed Use Commercial	1.5	25	Parking Lot	Yes	Partial Floodplain

Site Suitability: Preparation of a site suitability analysis is the second step in addressing the adequate sites requirement. In addition to providing a listing of sites, local governments must prepare an analysis that demonstrates which identified sites can accommodate the housing needs, by income level, within the planning period of the element (see screens 14-17 for descriptions of site constraints analysis, appropriate density, and development capacity requirements).

KEY IDEAS

II. HELPFUL HINTS

- The development suitability requirement addressing zoning, density, realistic development capacity, lot size, and existing use(s) must be done on a parcel/site specific basis.
- Local governments should consult with the for- and non-profit development community for the purposes of soliciting information about site and zoning related factors which are useful in helping to reduce development costs.
- For the purpose of mapping small or scattered housing opportunity sites (e.g., sites within a redevelopment project area, along commercial corridors, or within adopted specific plan areas) local governments can use community plan or neighborhood scale maps or aerials.
- To further assist the development community in selecting potential development sites, a local government could post the inventory on its web site.
- To ensure the inventory remains a viable and useable land-use planning tool throughout the planning period, local governments should prepare periodic updates (e.g., in conjunction it annual general plan progress report).

III. MODEL ANALYSES

[Sample Sites Inventory](#)

The following files contain examples of parcel specific inventories of available sites prepared by the City of Citrus Heights and Sonoma County. Note the parcel specific identification, including an indication of zoning, general plan designation, parcel size, and existing uses. The added features of having links to aerials (Citrus Heights) and actual photos of the sites (Sonoma County) makes these examples especially useful in determining the appropriateness of the identified sites and providing an effective resource for the development community. A detailed site suitability analysis and constraints summary must be included with the parcel specific listing (not included with these examples).

[Highlighted Jurisdiction - City of Citrus Heights](#)

[Highlighted Jurisdiction - Sonoma County](#)

IV. LINKS

[HCD: AB 2348 Technical Assistance Paper](#)